

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

KAITLIN FLANNERY,

Plaintiff,

- against -

THE CITY OF ROCHESTER, a municipal entity,
“JOHN DOE POLICE OFFICERS 1-200” (names and
number of whom are unknown at present), COUNTY
OF MONROE, TODD BAXTER, “RICHARD ROE
SHERIFF’S DEPUTIES 1-200” (names and number of
whom are unknown at present), and other unidentified
members of the Rochester Police Department and
Monroe County Sheriff’s Office,

Defendants.

**NOTICE OF MOTION
TO PARTIALLY DISMISS
THE AMENDED
COMPLAINT**

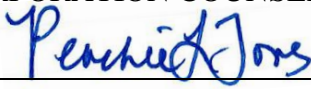
Case no: 6:22-cv-6062

Defendant City of Rochester (“City”) moves this Court pursuant to FED. R. CIV. P. 12(b)(6) to dismiss for failure to state a claim for relief the first, sixth, ninth, tenth, and eleventh causes of action in Plaintiff’s complaint.

In support of this motion, the Court is referred to the Declaration of Peachie L. Jones, Esq., with exhibit attached, and the Memorandum of Law, all submitted herewith and made part of this motion. The City reserves the right to file a reply memorandum of law within fourteen days of Plaintiff’s filing any opposition to this motion.

Date: February 8, 2022

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